

1 HON. JOHN C. COUGHENOUR  
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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

DR. A. CEMAL EKIN, individually and on  
behalf of similarly situated individuals,

Plaintiff,

v.

AMAZON SERVICES LLC, a Nevada limited  
liability company,

Defendant.

NO. 2:14-cv-00244-JCC

PLAINTIFF EKIN'S REQUEST FOR  
LOCAL RULE 7(i) TELEPHONIC  
MOTION

On July 24, Amazon filed three separate dispositive motions: (1) Amazon's Motion to Dismiss Under Fed. R. Civ. P. 12(b)(6) at Dkt. No. 27 (21 pages), (2) Amazon's Motion to Compel Arbitration at Dkt. No. 24 (18 pages), and (3) Amazon's Motion to Dismiss Under Fed. R. Civ. P. 12(b)(1) at Dkt. No. 23 (13 pages). Pursuant to Local Rule 7(e)(3), "[a]bsent leave of court, parties must not file contemporaneous dispositive motions, each one directed toward a discrete issue or claim." Plaintiff's counsel requested that Amazon voluntarily strike two of the motions. *See Exhibit A*, attached hereto. Amazon's counsel, in a voicemail, indicated that they view the rule differently and suggested that the parties have a telephonic

1 conference with the court. Accordingly, plaintiff's counsel respectfully requests a  
2 telephonic motion pursuant to LR 7(i).

3 DATED: July 29, 2014.

4 SIRIANNI YOUTZ  
5 SPOONEMORE HAMBURGER

6 By */s/ Richard E. Spoonemore*  
7 Richard E. Spoonemore (WSBA #21833)  
Co-counsel for Plaintiff Ekin

8 –and–

9 DAVID M. SIMMONDS

10 By */s/ David M. Simmonds*  
11 David M. Simmonds (WSBA #6994)  
Co-counsel for Plaintiff Ekin

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**CERTIFICATE OF SERVICE**

I hereby certify that on July 29, 2014, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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DATED July 29, 2014, at Seattle, Washington.

By /s/ Richard E. Spoonemore  
Richard E. Spoonemore (WSBA #21833)